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September 10, 2013

Judge Robert P. Patterson, Jr.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: Martinez, et al v. Target
Corporation
Case NO.: 1:13-cv-00447-RPP
Our File No.: 11017712EB

Dear Judge Patterson:

Please be advised that this firm represents the Plaintiffs in connection with the above referenced action.

I am writing this letter motion to request permission from your Honor to serve and file a Supplemental Summons and Complaint in the form annexed adding an additional and necessary party to this litigation, All Jersey Janitorial Services, Inc. This action involves a slip and fall accident on a slippery aisle floor inside a Target department store. As a result of receiving discovery from the Defendant, Target Corporation, we have learned that Target Corporation had contracted with this proposed new Defendant, All Jersey Janitorial Services, Inc. to provide maintenance services, including washing and waxing the floors, of the subject store. One of Plaintiff's allegations is that the floor was left wet and slippery as a result of a condition caused and/or created by the negligent cleaning of the subject floor as well as a failure to place warning signs in the area. Our initial investigation did not and could not have revealed the existence of this party. Additionally, the proposed new Defendant, All Jersey Janitorial Services, Inc., is a New Jersey resident and, therefore, if added, there will still be complete diversity.

I had previously forwarded a Stipulation to counsel for Defendant Target Corporation along with a copy of the proposed Supplemental Summons and Amended Complaint requesting their

Page 2
September 10, 2013

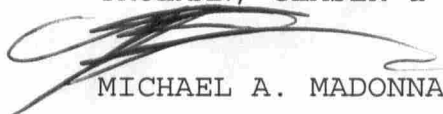
consent to add this Defendant. By letter dated August 23, 2013 (which my office didn't receive until September 4, 2013), counsel for Defendant Target Corporation advised that they could not consent, but does not oppose, the adding of this additional defendant. A copy of the Stipulation, proposed Supplemental Summons and Complaint as well as Defense Counsel's letter in response is enclosed.

As a result, I am requesting this Court's permission to file and serve the Supplemental Summons and Amended Complaint in the form annexed adding as an additional Defendant, All Jersey Janitorial Services, Inc.

Thank you in advance for your attention to this matter.

Very truly yours,

TROLMAN, GLASER & LICHTMAN, P.C.



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Encs.